

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

PATRIARCH PARTNERS AGENCY SERVICES,
LLC,

Plaintiff,

-against-

ZOHAR CDO 2003-1 LTD., et al.,

Defendants.

Case No. 16-cv-4488 (VM) (KHP)

Judge: Hon. Victor Marrero
Magistrate Judge: Katharine H. Parker

ORAL ARGUMENT REQUESTED

NOTICE OF MOTION FOR SUMMARY JUDGMENT AGAINST DEFENDANTS

PLEASE TAKE NOTICE THAT upon the accompanying memorandum of law dated July 18, 2024; Plaintiff Patriarch Partners Agency Services, LLC's Rule 56.1 Statement of Undisputed Material Facts; and the Declaration of Akiva Shapiro dated July 18, 2024, together with all exhibits attached thereto; and upon all prior proceedings herein, the undersigned, attorneys for Plaintiff Patriarch Partners Agency Services, LLC ("PPAS"), respectfully move this Court before the Honorable Victor Marrero, United States District Judge, in Courtroom 15B of the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York. New York, at a time and date to be determined by the Court, for an order (1) granting PPAS summary judgment of liability on its Count II, Dkt. 46; (2) granting PPAS summary judgment dismissing with prejudice Zohar Litigation Trust-A's Counterclaims II-VII, Dkt. 179, and (3) dismissing as moot PPAS's Count I, Dkt. 43, and Zohar Litigation Trust-A's Counterclaim I, Dkt. 179, pursuant to Federal Rule of Civil Procedure 56 and Local Civil Rule 56.1 of the Local Rules of the United States District Court for the Southern District of New York, and for such other relief as the Court deems just and proper.

Dated: July 18, 2024
New York, New York

Respectfully submitted,

/s/ Akiva Shapiro

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